ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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BRUCE RAUNER, GOVERNOR

ALEC MESSINA, ACTING DIRECTOR

October 12, 2016

Mr. Daniel Grapski ExxonMobil Environmental Services Company Project Coordinator 25915 S. Frontage Rd. SH&E Building/Room 237 Channahon, IL 60410 US FPA RI CORDS CI NTI R REGION 5

Mr. Wilmer Reyes CBS Operations 20 Stanwix Street, 10th Floor Pittsburgh, PA 15222

Re: 0110300003 – Bureau County

New Jersey Zinc/Mobil Chemical Superfund/Technical Reports

Operable Unit 2 – Phosphogypsum Stack Area

Dear Mr. Grapski and Mr. Reyes:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the *Soil Borrow Area Sampling Data Summary, Operable Units 2 and 4, Closure of the DePue Phosphogypsum Stack System, The DePue Site, DePue IL*, dated May 11, 2016 and received May 12, 2016. This submittal was prepared by Amec Foster Wheeler and submitted on behalf of the DePue Group.

In addition to the data summary, Illinois EPA also requested follow up information regarding how duplicates were evaluated, calculation of 95% upper confidence levels for those chemicals that exhibited individual sample results above the Tier 1 values in 35 Illinois Administrative Code Part 742, and an outlier analysis. After reviewing this additional information from Amec Foster Wheeler (provided in e-mails of July 29, 2016, September 20, 2016, and September 30, 2016), Illinois EPA can accept the borrow source soil results for Operable Unit (OU) 2, with the following condition: the area represented by sample locations B4, B23 and B24 should not be included in the soils to be used for the OU2 cover. These locations represent outliers or levels above OU4 preliminary remediation goals.

Alternatively, additional characterization of these specific areas can occur to determine the extent of the anomalous results. Such additional characterization can occur now or at a later time as convenient.

At this time, Illinois EPA is not accepting this area as a backfill source for OU4. Illinois EPA and the DePue Group will continue discussions regarding the appropriate evaluation for the OU4 backfill source(s).

If you have any questions or need additional information, please contact me at 217-785-2891 or at Charlene. Falco@illinois.gov.

Sincerely,

Project Manager

Federal Site Remediation Section

CAT CLS p \DePue New Jersey Zinc Mobil Chemical\OU2 Phosphogypsum Stack Area\Closure Plan\Borrow Source\Approval of Backfill Source docx

cc: Kevin Phillips, E&E

Joe Abel, ExxonMobil Environmental Services Company (via e-mail)

Jennifer Elkins, USEPA Region 5

Elizabeth Wallace, Office of the Illinois Attorney General

Beth Whetsell, Illinois Department of Natural Resources

Steve Walker, Enercon (via e-mail)

Scott Hayter, Ramboll Environ (via e-mail)